

## **SIERRA ACCESS COALITION**

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Sierra Access Coalition (SAC), a group of over 1100 members, wants to ensure that the limited OHV funds are spent appropriately and will benefit the OHV users who contribute to the fund. The sheer dollar amount of the Plumas NF Ground Operations OHV grant proposal is very large, which warrants extra scrutiny on this project. We submit the following comments on this proposal, in the order listed in the Project Cost Estimate:

1. The cost estimate displays \$71,588 (a total of 158 days, which equals nearly 32 weeks) of combined time for the Forest Supervisor, GS-13 staff, and GS-11 staff. The grant proposal gives no information as to what these top staff individuals, who typically work in the office, will contribute to the project.
2. The grant proposes Summer Toilet Pumping at several campgrounds. None of the campgrounds are exclusive to OHVs, so SAC questions whether using OHV funds for pumping is appropriate. In fact, some of the campgrounds are no longer accessible by OHVs. One example is that restrictions on ML 3 roads close the main access to Brady's Camp. Little North Fork and Rogers Cow Camp are likely to no longer be used by OHVs because the Travel Management Plan (TMP) excluded the non-system user routes out of this area. Little North Fork CG is identified in the Plumas Land Management Plan for closure when improvements are needed. The Four Trees Staging area used to access two OHV use areas known as French Creek and Granite Basin. The non-system user route link to Granite Basin OHV is no longer accessible by OHVs due to the TMP. Little Grass Valley dam receives very little OHV use. SAC would like to see a more appropriate plan for pumping toilets using OHV funds. District employees have told SAC that the toilets that are proposed for OHV funding are only pumped once a year, and some are pumped every other year. The majority of use of these toilets is not OHV, so it is not appropriate to charge OHV funds for the entire cost of maintaining these toilets.
3. The Travel Management FEIS (p. 49, table 12) National Visitor Use Monitoring (NVUM) Survey states that 1.6% participate in OHV activity and that only 0.3% do it as a main activity. Snowmobiling is 9.8% and 9.0% respectively. SAC's opinion is that OHV Grant funds are for expenditures related to Green/Red sticker vehicle use, not for use by licensed vehicles (ie. driving a truck on gravel roads). Therefore, based on their own figures, the PNF should only be using OHV funds for less than 10% of the total pumping costs.

4. Four Trees and Rogers Cow Camp have only one legal FS system road access leaving the facilities to OHV trail routes in the French Creek area many miles away. The FEIS Alt 5 map has removed the connector trails. The only quad and beginner to intermediate motorcycle access to Alt 5 routes from both of these sites is to travel on the paved section of French Creek road or Oro-Quincy Hwy, which is illegal. Therefore continuing to use OHV funds for these facilities is no longer appropriate.
5. The request for an asphalt slurry seal at the Four Trees Staging area is interesting. There is a warming hut used by snowmobiles in the winter, but the asphalt is covered with snow (it is not snowplowed). During the summer, OHVs can no longer use this staging area because the Travel Management Plan did not designate routes that connect to the forest from the staging area. For these reasons, we believe the slurry seal is inappropriate use of OHV funds.
6. This grant proposes to repair 14 miles of trails that maybe added to the MVUM. SAC assumes these are the "Table 2" routes in the Travel Management Record of Decision. With such a large grant request, we questions why only 14 miles of the 69 miles in "Table 2" are proposed for repair. This is a 3-year grant, so we had hoped that all 69 miles would be mitigated within a year or two as we were promised at public meetings.
7. The grant currently has a line item for "Staging Area Overlay" at the LaPorte staging area. The Plumas NF assured us this line item will be eliminated from the final proposal.
8. Each district is requesting \$3000 for supplies, for a total of \$9000. However no details are given to indicate what the supplies are and what they will be used for.
9. The grant requests 50 signs @ \$150 each. There is no description of what type of signs these are and district personnel could not answer that question when SAC asked for more information. SAC would like to see signs installed on all routes that were designated under the Travel Management Plan. But 50 signs is not sufficient, and the signs for route identification don't cost \$150 each. So this line item is unclear as to it's intent.
10. The proposal asks for \$2500 for motorcycle maintenance. This is a high cost, and since OHV funds purchased the motorcycles, it is not unreasonable to ask the PNF to bear the cost of maintenance.
11. The proposal asks for \$12,000 for summer and winter safety gear. Since the PNF already owns and operates motorcycles and quads, by their own safety regulations they are already required to have safety gear. If the PNF needs more safety gear, the cost needs to be justified.
12. The equipment rental of \$10,500 is not explained in the proposal. It is impossible to tell what the equipment is, who is operating it (it must be a Wage Grade Equipment Operator), and what work will be accomplished with the machine. SAC requests more information on this item.
13. An enclosed snowmobile trailer is requested for a cost of \$6000 for storage of snowmobiles. This is an excessive cost for the mere storage of snowmobiles. The district already owns a trailer

for transporting snowmobiles. SAC suggests that instead the FS purchase custom covers and tarps for their snowmobiles, like the majority of snowmobile owners in Plumas County do.

14. A 30" Snow blower is requested for exclusive use at Lakes Basin staging area for snow removal to the restrooms and bulletin board. These two areas consist of approx. 20' of walkway, which can easily be shoveled rather than using a snow blower which requires transportation, maintenance, fuel, oil, chains, etc. Since the length of the walkway is so short, SAC suggests that FS employees shovel the snow, like the majority of Plumas County residents do.
15. Two ATV's are requested for Mt Hough at a cost of \$9000 each. First, this cost is excessive and should not be funded. This is a public agency that needs utility grade machines, which can be purchased for \$6000 each. But, first it should be considered that the LEOs and other departments already have quads, motorcycles, and snowmobiles. It is logical to assume that these machines could be shared. SAC is not convinced that Mt Hough should purchase additional machines with OHV funds.

OHV grant funds are dwindling and can no longer be considered a luxury to the Forest Service. The OHV Commission has asked the user groups and public to analyze and comment on the grant proposals. Due to the numerous questions that remain unanswered on this grant request, Sierra Access Coalition cannot support this request as submitted.

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Sierra Access Coalition (SAC), a group of over 1100 members, wants to ensure that the limited OHV funds are spent appropriately and will benefit the OHV users who contribute to the fund. We submit the following comments on the Plumas NF OHV Campground Improvement grant proposal:

1. We question the days of matching time for the GS-11 (15 days = 3 weeks), GS-9 (30 days = 6 weeks), GS-7 (30 days = 6 weeks) and seasonal maintenance worker (20 days = 4 weeks). These times seem excessive. SAC would like more information about what these workers will actually do for the matching time.
2. We are also concerned about the ratio of overhead to on-the-ground workers. There are 45 days in this grant for overhead and 50 days for the workers. This 47% overhead rate is not acceptable.
3. These campgrounds are not used exclusively by OHVs. SAC would like to know how other users or Forest Service appropriated funds help pay for work in these campgrounds.
4. There is \$4500 in matching funds for hazard tree removal but there is no mention of which campgrounds have hazard trees. SAC is requesting this information be shown in the grant proposal.
5. Meadow Camp used to be a dispersed camping area used by equestrians and OHVs. The camp area is no longer accessible due to the Travel Management Plan. The FS is proposing improvements to this area and making it a designated campground, which would exclude equestrian use. SAC supports access for all forest users and want this camping area to remain open to everyone.

SAC is usually supportive of this type of grant, but questions remain that need to be answered. Until this information is received, we cannot support this grant.

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Sierra Access Coalition (SAC), a group of over 1100 members, wants to ensure that the limited OHV funds are spent appropriately and will benefit the OHV users who contribute to the fund. We submit the following comments on the Plumas NF Whitlock Ravine Staging Area grant proposal:

1. This area was often used by OHVs for a staging area in the past, but is now illegal to use since implementation of the Travel Management Plan. There has been no public scoping or NEPA analysis for this area that we are aware of.
2. The area is known to be a dumping area for local residents, which is unrelated to OHVs. The FS says a large part of the reason for improving this staging area is to deter garbage dumpers. It is good to manage the area to discourage dumping, but SAC questions whether the cost is appropriate for OHV funds.
3. The proposal costs are not accurate and the proposal doesn't appear to be well thought out. This is a very small area (approx 75' x 200'). The FS proposes 3 tables and 4 bulletin boards. We don't see a need for this many items in such a small area.
4. The proposal originally had concrete fencing. The FS said they could change that to boulders, but the area is well defined by the adjacent roads and tree lines. So there is no need for boulders.
5. The FS said they would contribute two fire rings, but the grant asks for funding for the fire rings.

SAC is generally supportive of using the area for OHV staging and dispersed camping, but the costs seem to be excessive for such a small area. The plan is not well thought out, and NEPA has not been done. SAC submitted suggestions and costs to the Plumas. Until some details are modified, SAC cannot support this grant as written.